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*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors

*\* ALL PAPERS SHALL BE FILED IN THE  
LEAD CASE, NO. 19-30088 (DM)*

Case Nos. 19-30088 (DM)

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' PRE-HEARING  
STATEMENT REGARDING THE  
NOVEMBER 7, 2023 HEARING**

Date: November 7, 2023

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Only)

United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized  
2 debtors (collectively, “PG&E,” the “Debtors” or the “Reorganized Debtors”), hereby submit  
3 this pre-hearing statement for the November 7, 2023 hearing.

4 At the October 17, 2023 hearing, the Court instructed PERA to provide more details  
5 regarding its forthcoming motion to withdraw the reference. Earlier today, PERA informed PG&E  
6 that it intends to move to withdraw the reference only in connection with PG&E’s forthcoming  
7 motion to dismiss PERA’s claims. At this time, PG&E does not have sufficient information to  
8 form a definitive view on PERA’s motion, but PG&E’s current intention is to oppose this motion.

9 Following the October 17, 2023 hearing, the parties continued to discuss the briefing  
10 schedule for PG&E’s forthcoming motions to dismiss. PG&E conferred with PERA, RKS and  
11 Baupost, and all agree that there should be one deadline for PG&E to file its motions to  
12 dismiss/claims objections, which should be December 13, 2023.<sup>1</sup> While, as noted by the Court at  
13 the October 17 hearing, the parties will address the schedule at the December 19, 2023 hearing  
14 after PG&E has filed its motions to dismiss, PG&E, PERA, and RKS also agree that there should  
15 be 60 days for the oppositions and 45 days for the replies on the motions to dismiss. Baupost has  
16 taken the position that there should be at least 90 days for the oppositions to the motions to dismiss.

17 Dated: November 3, 2023

Respectfully submitted,

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19 **WEIL, GOTSHAL & MANGES LLP**  
20 **KELLER BENVENUTTI KIM LLP**  
21 **LATHAM & WATKINS LLP**

22 By: /s/ Richard W. Slack

23 Richard W. Slack

24 *Attorneys for Debtors and Reorganized*  
25 *Debtors*

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27  
28 <sup>1</sup> The current objection deadline, as set forth in ECF No. 13934-1, is “60 days [from] the filing date of the amended Proof of Claim,” which has created staggered deadlines. PG&E intends to submit a proposed order to the Court to set this one deadline.